

Exhibit 28

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF NEW JERSEY
3 CAMDEN VICINAGE

4 *****
5 IN RE: VALSARTAN, LOSARTAN, MDL No. 2875
6 AND IRBESARTAN PRODUCTS

7 LIABILITY LITIGATION Civil No.
8 19-2875

9 ***** (RBK/JS)

10 THIS DOCUMENT APPLIES TO ALL
11 CASES HON ROBERT B.
12 KUGLER

13 *****

14 - CONFIDENTIAL INFORMATION -
15 SUBJECT TO PROTECTIVE ORDER

16
17 Continued Remote Videotaped via
18 Zoom Deposition of JUCAI GE, held at the
19 location of the deponent, commencing at 6:40
20 a.m. China Standard Time, on the 27th of May,
21 2022, before Maureen O'Connor Pollard,
22 Registered Diplomat Reporter, Realtime
23 Systems Administrator, Certified Shorthand
24 Reporter.

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1 an understanding of the communication, being
2 this e-mail.

3 As seen in the title, it was
4 about N-nitroso impurity found in the
5 technical improvement of irbesartan, and he
6 was trying to conduct a structural and a
7 toxicological comparison between that
8 impurity and the Impurity K in valsartan as
9 well as NDMA, with NDMA being one of the
10 naturally occurring N-nitroso compounds.
11 That's why he included that impurity,
12 Impurity K, and NDMA in his memo.

13 However, the whole e-mail was
14 about the analysis of the impurity found in
15 the technical improvement of irbesartan.

16 Q. The sentence that Mr. Slater
17 read you -- and you can pull it up if you
18 want to refresh your recollection -- says
19 that what was occurring in irbesartan was
20 similar to the NDMA that occurs in valsartan
21 when quenched with sodium nitrite.

22 Do you recall that sentence?

23 A. As for that sentence -- hold
24 on. Let me read it.

1 I recall it. I see it now.

2 Q. Thank you.

3 Can you help the jury
4 understand, Ms. Ge, how to reconcile that
5 sentence with the testimony you've given
6 today and yesterday about your understanding
7 of the overall document?

8 MR. SLATER: Objection.

9 You can answer.

10 THE WITNESS: Yes, I can.

11 For the entirety of this
12 e-mail, it was talking about this
13 N-nitroso compound impurity found in
14 the technical improvement of
15 irbesartan.

16 However, this e-mail was
17 written in such a lousy way, so in
18 terms of the discussion on the
19 structure, it was very confusing.

20 At that time he was only trying
21 to make a comparison in structure;
22 therefore, he was trying to find
23 something, and he came across this
24 patent which talked about Impurity K

Exhibit 29

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18 Remote Videotaped via Zoom
19 Deposition of JUCAI GE, held at the location
20 of the deponent, commencing at 7:04 a.m.
21 China Standard Time, on the 26th of May,
22 2022, before Maureen O'Connor Pollard,
23 Registered Diplomat Reporter, Realtime
24 Systems Administrator, Certified Shorthand
25 Reporter.

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1 deposition, I first approached my attorney or
2 attorneys to have a better understanding of
3 the topics. Then I approached related people
4 and communicated with them, and I also
5 reviewed the related documents.

6 Q. As part of your preparation,
7 did you speak with Min Li? Yes or no.

8 A. Yes, I did.

9 Q. As part of your preparation,
10 did you speak with Jinsheng Lin?

11 A. Yes, I did.

12 Q. As part of your preparation,
13 did you speak with Peng Dong?

14 A. Yes, I did.

15 Q. As part of your preparation,
16 did you speak with Linda Lin?

17 A. Yes, I did.

18 Q. As part of your preparation,
19 did you speak with Hai Wang?

20 A. Yes, I did.

21 Q. As part of your preparation,
22 did you speak with Lewis Chodosh?

23 A. Yes, I did.

24 Q. Did you speak with anybody else